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MAY - 2 2014

JEFFREY E. LEWIS, CLERK OF COURT
SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF KINGS

DEPUTY

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Attorneys for Plaintiff
THE PEOPLE OF THE STATE OF CALIFORNIA

SUPERIOR COURT OF CALIFORNIA, COUNTY OF KINGS

THE PEOPLE OF THE STATE OF
CALIFORNIA,

Plaintiff,

vs.

JEFFREY ALLEN PRINS,
Defendant.

Case No.: 14CM0187

FIRST AMENDED CRIMINAL COMPLAINT

The undersigned, verifying upon information and belief, complains that in the County of Kings,
State of California, the defendant did commit the following crimes:

COUNT 1

On or about January 23, 2013, said defendant **JEFFREY A. PRINS** did commit a
MISDEMEANOR, namely: a violation of section 25190 of the Health and Safety Code of the State of
California, in that said defendant did violate a rule, regulation, standard, or requirement issued or
adopted pursuant to chapter 6.5 of division 20 of the Health and Safety Code, commonly known as the
Hazardous Waste Control Law, relating to handling, disposal, and storage of hazardous and universal

1 wastes at 866 East Fifth Street and 10716 Eighth Avenue in Hanford, California, 93230, to wit,
2 improper storage of hazardous waste regarding lining and placing tarps over waste piles.

3
4 **COUNT 2**

5 On or about January 23, 2013, said defendant **JEFFREY A. PRINS** did commit a
6 **MISDEMEANOR**, namely: a violation of section 25212 of the Health and Safety Code of the State of
7 California, in that said defendant failed to remove materials requiring special handling (MRSH) from
8 major appliances in which they were contained prior to the appliances being crushed, baled, shredded,
9 sawed or sheared apart, disposed of, or otherwise processed in a manner that could result in a release or
10 could prevent the removal of materials that require special handling at 866 East Fifth Street in Hanford,
11 California, 93230.

12
13
14 I declare under penalty of perjury that the foregoing is true and correct.

15 Executed on April 30, 2014, at Hanford, California.

16
17 GREGORY E. STRICKLAND
18 KINGS COUNTY DISTRICT ATTORNEY

19
20 By:  _____

21 MATTHEW K. CARR
22 Deputy District Attorney

23 **DISCOVERY REQUEST**

24 Pursuant to Penal Code section, 1054.5(b), the People are hereby informally requesting
25 that defendant's counsel provide discovery to the People as required by Penal Code section
26 1054.3.
27
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